

**BEFORE THE FLORIDA
JUDICIAL QUALIFICATIONS COMMISSION**

**INQUIRY CONCERNING A
JUDGE, NO. 01-244**

CASE NO.: SC01-2670

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ADDENDUM TO RESPONDENT'S PREHEARING STATEMENT

Pursuant to the Order Scheduling Hearing and Prehearing Conference, the Respondent provides this addendum to prehearing statement:¹

WITNESSES TO BE CALLED BY RESPONDENT

1. Sandra Backinger – Will testify to the fact that the key which is the subject of the theft count was reported lost several hours before Lisa or Nina Jeanes ever met the Respondent. Will also testify to absence of any damage to door of Room 306 at Normandy Inn and will authenticate records of Normandy Inn
2. Jose Tores – Will testify no repairs to door or chain of Room 306 at Normandy Inn.

Respectfully submitted,

ROBERT W. MERKLE, ESQ.

Florida Bar Number: 138183

¹ Discovery is ongoing. Respondent reserves the right to seek to add additional witnesses and exhibits, as more information is discovered.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via facsimile and U.S. Mail to: **Judge James R. Jorgenson**, Chair of the Judicial Qualifications Commission Hearing Panel, 3rd District Court of Appeal, 2001 S.W. 117th Avenue, Miami, Florida 33175-1716; **John Beranek, Esq.**, Counsel to the Hearing Panel of the Judicial Qualifications Commission, P.O. Box 391, Tallahassee, Florida 32302; **John S. Mills, Esq.**, Special Counsel, Foley & Laudner, 200 Laura Street, Jacksonville, Florida 32201-0240; **Brooke S. Kennerly**, Executive Director of the Florida Judicial Qualifications Commission, 1110 Thomasville Road, Tallahassee, Florida 32303; **Thomas C. MacDonald, Jr., Esq.**, General Counsel to the Investigative Panel of the Judicial Qualifications Commission, 100 North Tampa Street, Suite 2100, Tampa, Florida 33602, **Louis Kwall, Esq.**, Co-Counsel for Respondent, 133 North Ft. Harrison Avenue, Clearwater, Florida 33755; this 13th day of March, 2002.

ROBERT W. MERKLE, ESQ.